

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

FILED

MAR 17 2020

U.S. DISTRICT COURT-WVND  
CLARKSBURG, WV 26301

CAMERON JAVON JONES, Plaintiff

Federal Civil Rights Complaint (Bivens Action,

v.

Civil Action No.: 5:20 cv 52

1. Officer L. McVickers; 2. Officer Brown;

3. Officer Barbera; 4. Lieutenant J. Seoul;

5. Lieutenant Howell; 6. Special Investigation Agent [NAME UNKNOWN];

7. Captain [NAME UNKNOWN]; 8. Warden: Joe Coxley;

9. Bureau of Prisons; 10. United States of America...

Bailey  
Mazzone  
Blalock

Jurisdiction:

This is a civil action brought pursuant to Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics, 403 U.S. 388 (1971). The Court has jurisdiction over this action pursuant to Title 28 U.S.C §§ 1331 and 2201.

Parties:

A. NAME of Plaintiff: CAMERON JAVON JONES INMATE No.: 12855-042

Address: Federal Correctional Complex

Allenwood, United States Penitentiary

P.O. Box 3000

White Deer, PA. 17887

Attachment A

B. Name of Defendant: Officer L. McVickers  
Position: Officer  
Place of Employment: Hazleton, USP  
Address: P.O. Box 2000/Bruceton Mills/WV. 26525

Was this Defendant acting under the authority or color of federal state law at the time these claims occurred? ☒ Yes ☐ No

If your answer is "YES," briefly explain: Officer L. McVickers, was A employee  
employ of the Federal Bureau of Prisons AND WAS ON duty when he  
violated my Civil Rights.

B.1 Name of Defendant: Officer Brown  
Position: Officer  
Place of Employment: Hazleton, USP  
Address: P.O. Box 2000/Bruceton Mills/WV. 26525

Was this Defendant acting under the authority or color of federal state law at the time these claims occurred? ☒ Yes ☐ No

If your answer is "YES," briefly explain: He WAS AN employee of the  
Federal Bureau of Prisons AND WAS ON duty when he violated my  
Civil Rights

B.2 Name of Defendant: Officer Barbera  
Position: Officer  
Place of Employment: Hazleton, USP  
Address: P.O. Box 2000/Bruceton Mills/WV. 26525

Was this Defendant acting under the authority or color of federal state law at the time these claims occurred? ☒ Yes ☐ No

Attachment A

If your answer is "YES," briefly explain: He was an employee of the Federal Bureau of Prisons and was on duty when he violated my Civil Rights

B.3 Name of Defendant: Lieutenant J. Seou  
Position: Lieutenant  
Place of Employment: Hazleton, USP  
Address: P.O. Box 2000 / Bruceton Mills / WV. 26525

Was this Defendant acting under the authority or color of federal state law at the time these claims occurred? ☒ Yes ☐ No

If your answer is "YES," briefly explain: He was an employee of the Federal Bureau of Prisons and was on duty when he violated my Civil Rights.

B.4 Name of Defendant: Lieutenant Howell  
Position: Lieutenant  
Place of Employment: Hazleton, USP  
Address: P.O. Box 2000 / Bruceton Mills / WV. 26525

Was this Defendant acting under the authority or color of federal state law at the time these claims occurred? ☒ Yes ☐ No

If your answer is "YES," briefly explain: He was an employee of the Federal Bureau of Prisons and was on duty during the period my Civil Right was violated

Note: Defendants B.6 to B.9 is continued on  
page: 10(b)

Attachment A

B.5 Name of Defendant: UNKNOWN  
Position: SPECIAL INVESTIGATION AGENT (S.I.A)  
Place of Employment: HAZELTON, USP  
Address: P.O. Box 2000 / BRUCE TON MILLS / WV. 26525

Was this Defendant acting under the authority or color of federal state law at the time these claims occurred? ☒ Yes ☐ No

If your answer is "YES," briefly explain: He WAS AN employee of the Federal BUREAU of PRISONS AND WAS ON duty during the period my CIVIL RIGHTS WAS VIOLATED.

### III. PLACE OF PRESENT CONFINEMENT

Name of Prison/ Institution: FCC Allenwood, USP

A. Is this where the events concerning your complaint took place?  
☐ Yes ☒ No

If you answered "NO," where did the events occur?

HAZELTON, USP

B. Is there a prisoner grievance procedure in the institution where the events occurred? ☒ Yes ☐ No

C. Did you file a grievance concerning the facts relating to this complaint in the prisoner grievance procedure?  
☒ Yes ☒ No

D. If your answer is "NO," explain why not: It was threatened by Officer L. McVickers that if I talked about the incident then it would happen AGAIN.

E. If your answer is "YES," identify the administrative grievance procedure number(s) in which the claims raised in this complaint were addressed

1. B.6; Name of Defendant: UNKNOWN

2. Position: CAPTAIN

3. Place of Employment: HAZELTON, USP

4. Address: P.O. Box 2000 / Bruce ton Mills / WV. 26525

5. Defendant was acting under the authority or color of federal state law at the

6. time these claims occurred; He was an employee of the Federal Bureau of

7. Prisons and was on duty during the period my Civil Rights was violated.

8.

9. B.7; Name of Defendant: Joe Coxley

10. Position: Warden

11. Place of Employment: HAZELTON, USP

12. Address: P.O. Box 2000 / Bruce ton Mills / WV. 26525

13. Defendant was acting under the authority or color of federal state law at the

14. time these claims occurred; He was an employee of the Federal Bureau of

15. Prisons and was on duty during the period my Civil Rights was violated.

16.

17. B.8; Name of Defendant: Bureau of Prisons

18. Position: Agency that employed the above defendants

19. Place of Employment: Department of Justice

20. Address: UNAVAILABLE to me at this time.

21. Defendant is the authority of the defendants, and their employee,

22. that violated my Civil Rights

23.

24. B.9; Name of Defendant: United States of America

25. Position: The Government of all the defendants and plaintiff.

26. Defendant is the Government of the Agencies that employ the defendants.

Attachment A

and state the result at level one, level two, and level three. **ATTACH GRIEVANCES AND RESPONSES:**

LEVEL 1 The matter was being investigated (Filed it at McCreary, USP)  
LEVEL 2 The matter was investigated (Filed it at McCreary, USP)  
LEVEL 3 The officers were found innocent (Filed it at McCreary, USP)

IV. **PREVIOUS LAWSUITS AND ADMINISTRATIVE REMEDIES**

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action? ☐ Yes ☒ No

B. If your answer is "YES", describe each lawsuit in the space below. If there is more than one lawsuit, describe additional lawsuits using the same format on a separate piece of paper which you should attach and label: "TV PREVIOUS LAWSUITS"

1. Parties to this previous lawsuit:

Plaintiff(s): \_\_\_\_\_

Defendant(s): \_\_\_\_\_

2. Court: \_\_\_\_\_  
(If federal court, name the district; if state court, name the county)

3. Case Number: \_\_\_\_\_

4. Basic Claim Made/Issues Raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5. Name of Judge(s) to whom case was assigned: \_\_\_\_\_

6. Disposition: \_\_\_\_\_  
(For example, was the case dismissed? Appealed? Pending?)

7. Approximate date of filing lawsuit: \_\_\_\_\_

Attachment A

8. Approximate date of disposition. Attach Copies: \_\_\_\_\_
- C. Did you seek informal or formal relief from the appropriate administrative officials regarding the acts complained of in Part B?  
☐ Yes ☐ No
- D. If your answer is "YES," briefly describe how relief was sought and the result. If your answer is "NO," explain why administrative relief was not sought.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- E. Did you exhaust available administrative remedies?  
☐ Yes ☐ No
- F. If your answer is "YES," briefly explain the steps taken and attach proof of exhaustion. If your answer is "NO," briefly explain why administrative remedies were not exhausted.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- G. If you are requesting to proceed in this action *in forma pauperis* under 28 U.S.C. § 1915, list each civil action or appeal you filed in any court of the United States while you were incarcerated or detained in any facility that was dismissed as frivolous, malicious, or for failure to state a claim upon which relief may be granted. Describe each civil action or appeal. If there is more than one civil action or appeal, describe the additional civil actions or appeals using the same format on a separate sheet of paper which you should attach and label "G. PREVIOUSLY DISMISSED ACTIONS OR APPEALS"
1. Parties to previous lawsuit:



"Factual History of Events Out of Which My"

Statement of Claim Arised

1. Location: Hazelton, USP

2. Unit: Z (Special Housing Unit [hereafter: SHU])

3. Date: 6-8-2016 to 1-6-2017 (See: Notice to Court)

4.

5. I, Cameron Jones, AM; and was at the time of these events; A Transgender  
6. Female. I was taken to the SHU on 6-8-2016. I was placed in the holding cell,  
7. which is in front of the officer's station, waiting to be processed. After  
8. standing on my feet for approx. 45 minutes I sat down. Officer Bledsoe  
9. told me to stand back up, and I complied. After standing for another  
10. hour, or so, my feet started hurting so I sat down again. Officer Bledsoe  
11. came out of the officers station with about 5 more officers. One unknown  
12. officer stated, "You go learn today!" Another unknown officer yelled,  
13. "Nigger!" They stripped searched me and made sexual comments about  
14. my body when they made me bend over. Officer Bledsoe said, "I'm going  
15. to put you in the cell with someone whose going to take that ass!"  
16. He put cuffs on me so tight that my hands went numb and then twisted  
17. the cuffs until they cut into my wrist. He told me that if I make a  
18. sound I was going to "eat the concrete." They put me in the cell with  
19. A unknown inmate who raped me twice and then told a Lieutenant that  
20. I couldn't be in the cell with him.

21. After I got out SHU I reported to SIS Lieutenant Howell that I was abused  
22. by staff. I had a large knot on my left wrist from having the cuffs twisted  
23. on my wrist. Lieutenant Howell took pictures of my injury and called medical  
24. to access the injury.

25. Dr. Fanning, Chief of Psychology, warned me that if I continue to talk  
26. to the executive staff about the abuses I suffered in the SHU then he



1. would put me on "medical observation" and "force medicate" me. I completed  
 2. the Administrative Remedy Process against him, in which I complained  
 3. of Dr. Fanning's threat and asked to be protected from him.  
 4. I completed the Administrative Remedy Process, also, against the abuses  
 5. by staff in the SHU. I asserted that I feared retaliation for reporting  
 6. the abuses and I asked to be protected from the officers in the complaint.  
 7. I also asked to be protected from being placed in the SHU of Hazelton,  
 8. USP, for fear of retaliation. I also asked to be transferred from Hazelton,  
 9. USP, for fear of my life.  
 10. I recorded two phone calls with my family, which detail the above facts  
 11. and that I feared that my life was in jeopardy at Hazelton, USP.  
 12. Location: Hazelton, USP  
 13. Unit: Z (SHU) / Date: 1-11-2017 (See: Notice to Court)  
 14. I, Cameron Jones, a Transgender Female, was placed in the SHU without  
 15. committing any prohibited act on, 1-6-2017. I was placed in the cell with a  
 16. unknown inmate. On 1-11-2017, the inmate complained to Lieutenant Vero that  
 17. I couldn't stay in the cell with, because I'm a Transgender. Lieutenant Vero  
 18. ordered Officer L. McVickers to place me in another cell. Officer L. McVickers  
 19. and a unknown officer put me in the cell, on Range 6, with an unknown  
 20. inmate who was a active member of a gang known as "Bloods". It is known by  
 21. the Bureau of Prisons that Bloods do not tolerate Gays or Transgenders.  
 22. The inmate refused to allow the officers to remove his cuffs. The officers  
 23. then entered the cell with me and the inmate and ordered him to let me stay  
 24. in the cell. The inmate threatened to hurt me when the officers left. The officers  
 25. told the inmate to do it when they take the cuffs off so they can see it.  
 26. The gang member agreed to do so. The two officers then exited the cell

1. And Officer L. McVickers stood in front of the doorway to order the door shut. I  
 2. turned to Officer L. McVickers and begged him to not let the inmate fight me.  
 3. In that moment the inmate pushed me into Officer L. McVickers. Officer  
 4. L. McVickers cursed and pushed me in the cell off of camera and threw me on  
 5. the cell floor. (My hands was cuffed behind my back the entire time.) Officer  
 6. L. McVickers twisted my hands as if was trying to break them. I cried, "He  
 7. pushed me! He pushed me!" but he continued to assault me. He grabbed  
 8. some of my hair and pulled it out and then he grabbed my head with both of  
 9. his hands and beat it into the floor until I was semi-unconscious. Another  
 10. officer cuffed my ankles and they carried me in a room without a camera and  
 11. pushed my face into the wall with my pants pulled down to my ankles. I  
 12. started crying and I heard a unknown officer say, "I don't want to do  
 13. this no more!" Another officer said, "It's too late, the camera coming!"  
 14. They recorded me on camera crying with my pants down to my ankles and  
 15. the right side of my head swollen. I told them that the inmate pushed me  
 16. into Officer L. McVickers, but they didn't care. They put me in arbitrary  
 17. cuffs for 12 hours and then put me in a cell without a shower for week.  
 18. SIS Lieutenant Howell interviewed me about the above incident and I told him  
 19. what happened and that I needed to be protected from Officer L. McVickers.  
 20. Lieutenant J. Seoul was present at this time.  
 21. Officer L. McVickers wrote a Incident Report against me for "Assault on  
 22. Staff". The incident report was thrown out and Officer L. McVickers  
 23. conspired against me with other SHU staff and retaliated against me  
 24. on 1-23-2017.  
 25.  
 26.

## "Statement of Claim"

1. Location: Hazelton, USP

2. Unit: Z (Special Housing Unit [hereafter: SHU])

3. Range: 5 / Cell # 218

4. Date: 1-23-2017 / Time: Approx. 2:00p.m. to 4:00p.m. (See: Notice to Court)

5.

6. I, CAMERON JONES, AM; AND WAS AT THE TIME; A TRANSGENDER FEMALE. WHILE I

7. WAS ASLEEP IN MY CELL OFFICER BROWN ORDERED ME TO SUBMIT TO RESTRAINTS

8. AND I COMPLIED. HE THEN ORDERED THE DOOR OPEN AND OFFICER L. McVICKERS

9. BROUGHT INMATE GERALD HERNANDEZ TO THE CELL. INMATE HERNANDEZ SEEN

10. THAT I WAS A BLACK TRANSGENDER FEMALE AND WARNED THE OFFICERS THAT

11. HE COULD NOT BE IN THE CELL WITH ME. OFFICER L. McVICKERS SAID, "YOU DON'T

12. HAVE A CHOICE!" AND PUSHED HIM IN THE CELL WITH ME. OFFICER L. McVICKERS

13. AND OFFICER BROWN ORDERED THE DOOR SHUT AND LEFT THE RANGE. INMATE

14. HERNANDEZ WAS A MEMBER OF THE GANG KNOWN AS "SURENOS" (SURENOS ARE A

15. SPANISH GANG THAT IS DESIGNATED BY THE BUREAU OF PRISONS [hereafter: B.O.P.]

16. AS A "Destructive Group". Surenos are known, by the B.O.P. for their hatred

17. for Gays, Transgenders, AND Blacks.) OFFICER L. McVICKERS AND OFFICER

18. BROWN KNEW THAT TWO Surenos WAS IN THE CELL DIRECTLY IN FRONT OF MY CELL,

19. ON THE OTHER SIDE OF THE RANGE, WHEN THEY FORCED HERNANDEZ IN THE CELL

20. WITH ME. THE TWO Surenos CALLED HERNANDEZ AND SPOKE TO HIM IN SPANISH.

21. HERNANDEZ WARNED ME THAT HE WAS A Surenos AND THAT IF THE OFFICERS

22. DIDN'T SEPERATE US THEN HE WAS GOING TO HURT ME. I PRESSED THE DURESS

23. BUTTON IN THE CELL FOR FEAR OF MY LIFE. OFFICER L. McVICKERS, OFFICER BROWN,

24. AND OFFICER BARBERA RESPONDED TO THE DURESS ALARM. I INFORMED THEM, "I

25. AM A BLACK TRANSGENDER AND HE IS A Surenos. If y'all don't seperate us

26. then he's going to hurt me." OFFICER L. McVICKERS RESPONDED, "God Bless!"

1. and then the three officers left the Ranch.  
2. As soon as the three officers shut the door Hernandez punched me in the  
3. face. The punch knocked me against the cell door. I pressed the duress  
4. alarm which was next to the door. I balled up against the door and begged  
5. Hernandez to stop. Hernandez cursed me and called me "faggot" and  
6. "nigger" while he punched and kneed me in the head, I cried and  
7. screamed "help" with all my might, but no officer came to help.  
8. Hernandez continued to assault me violently and relentlessly for  
9. approximately 30 minutes. I screamed and cried for help the entire time.  
10. I know the officers heard me screaming because Officer L. McVickers  
11. stated in his report, "I heard loud screams coming from Range 5..."  
12. After being assaulted for 30 minutes Officer L. McVickers entered the  
13. Range and looked in my cell. Hernandez ran to the back of the cell and  
14. I told Officer L. McVickers, "He's beating me up!" Officer L. McVickers  
15. looked at face which was black and swollen beyond recognition. I  
16. was bleeding profusely from my nose and mouth. My shirt was  
17. saturated with my blood. Officer L. McVickers frowned at me and walked  
18. away. He then made a casual routine round on the Range as if everything  
19. was normal. (A "Round" is when a officer routinely walks around the entire  
20. range and looks in cells for security and inmate safety.) When Officer  
21. L. McVickers left my door and made his round on the Range, Hernandez  
22. commenced again with his assault on me. That's when I thought I was  
23. going to die. I screamed and cried for Officer L. McVickers to help me  
24. as Hernandez cursed and assaulted. Yet Officer L. McVickers ignored  
25. my screams and continued to make his round as if he didn't hear me  
26. screaming. Officer L. McVickers walked off the Range and called

1. for assistance. Officer L. McVickers, Officer Brown, and Officer  
2. Barber approached the cell and opened the door slot. Officer L.  
3. McVickers yelled, "Cuff up!" As I stood to submit to cuffs  
4. Officer L. McVickers, instead of cuffing me, aimed his can of CO<sub>2</sub> at  
5. me and sprayed me in the back with the CO<sub>2</sub>. I ran from it as the  
6. stream of CO<sub>2</sub> was hitting me in the back. He closed the door slot  
7. while we choked. He opened the tray slot again and aimed the can  
8. of CO<sub>2</sub> at me and sprayed it directly and only on me and then  
9. shut the tray slot again. Officer L. McVickers opened the tray  
10. slot again and allowed us to cuff up. The officers pulled us out  
11. the cell and put us in a cage until medical came. Officer Brown  
12. smiled at me and stated, "You're pretty now." He then took  
13. digital pictures of me. Officer L. McVickers warned that if I  
14. talk about what happened then it would happen again.  
15. Lieutenant J. Seoul was the SHU Lieutenant and he was present during  
16. the incident. He conspired with his staff against me. He did not help  
17. or stop the assault on me. The SHU staff separated me from inmate  
18. Hernandez and placed me back in the same cell that was filled  
19. with CO<sub>2</sub>. For two weeks the SHU staff left me without a change of  
20. clothes. I showed the bloody and CO<sub>2</sub> filled shirt to A.W. Keys,  
21. and my Unit Manager, Ms. Langdon; and to SIS Lieutenant Howell.  
22. I asked SIS Lieutenant Howell, once again, to separate me from Officer  
23. L. McVickers. Yet no one helped me.

24.

25.

26.



## "Specific Conduct of Civil Rights Violation"

### 1. #1. Officer L. McVickers:

2. (1) Conspired to, and did, put my life in danger by forcing inmate  
3. Gerald Hernandez, a Surenos, in the cell with me, Cameron Jones, a  
4. Black, Transgender Female. (2) He knew, or should have known, that  
5. Gerald Hernandez was a Surenos and that Surenos hate Blacks and  
6. Transgenders. (3) He ignored Hernandez warning against being in the  
7. cell with me. (4) He ignored me when I told him that Hernandez was  
8. going to hurt me if he didn't separate us. (5) He ignored the duress alarm  
9. and my screams for help for approximately 30 minutes. (6) He ignored  
10. my immediate need for medical attention and my immediate need to be  
11. separated from Gerald Hernandez when he looked in the cell and seen  
12. that I was severely injured. (7) He ignored me being assaulted by  
13. Hernandez and my screams for help while he made a routine round on the  
14. Range. (8) He neglected to press his body alarm which is protocol when  
15. a officer witness an assault. (9) He inhumanely sprayed me with CO<sub>2</sub>  
16. without allowing me to cuff up. (10) He placed me back in the same cell  
17. that was filled with CO<sub>2</sub> and with the same clothes that was sprayed with  
18. CO<sub>2</sub> and that was bloody. (11) He threatened that if I reported what  
19. happened then it would happen again.

### 20. #2. Officer Brown:

21. (1) Conspired to, and did, put my life in jeopardy by forcing inmate Gerald  
22. Hernandez, a Surenos, in the cell with me, Cameron Jones, a Black, Transgender  
23. Female. (2) He knew, or should have known, that Hernandez was a Surenos and  
24. that Surenos hate Blacks and Transgenders. (3) He ignored Hernandez  
25. warning against being in the cell with me. (4) He ignored me when I told him  
26. that Hernandez was going to hurt me if he didn't separate us.



1. (5) He ignored the duress alarm and my screams for help for approximately  
 2. 30 minutes. (6) He neglected to press his body alarm which is protocol  
 3. when a officer hear an assault. (7) He placed me back in the same cell that  
 4. was filled with CO<sub>2</sub> and with the same clothes that was sprayed with  
 5. CO<sub>2</sub> and that was bloody.

6. #3 Officer Babbera:

7. (1) Conspired to, and did, put my life in jeopardy when he ignored me when I  
 8. told him that Hernandez was going to hurt me if he didn't separate us.

9. (2) He knew, or should have known, that Hernandez was a Surenos and  
 10. that Surenos hate Blacks and Transgenders. (3) He ignored the duress  
 11. alarm and my screams for help for approximately 30 minutes. (4) He  
 12. neglected to press his body alarm which is protocol when a officer hear an  
 13. assault. (5) He placed me in the same cell that was filled with CO<sub>2</sub> and in the  
 14. same clothes that was sprayed with CO<sub>2</sub> and that was bloody.

15. #4 Lieutenant J. Seoul:

16. (1) Conspired to, and did, put my life in jeopardy when he did not stop his  
 17. officers from putting Hernandez in the cell with me. (2) He knew, or should  
 18. have known, that Hernandez was a Surenos and that Surenos hate Blacks and  
 19. Transgenders. (3) He ignored the duress alarm and my screams for help for  
 20. approximately 30 minutes. (4) He neglected to press his body alarm which is  
 21. protocol when a officer hear an assault. (5) He knew, or should have known,  
 22. that his officers were putting my life in jeopardy.

23. #5 Lieutenant Howell:

24. (1) He ignored my request and need to be protected from and separated from  
 25. Officer L. McVickers, before and after the violation of my Civil Rights on  
 26. 1-23-2017. (2) Failed to report the conduct of the defendants who violated my

1. Civil Rights to the necessary agencies, as is incumbent of the Special
2. Investigation Services (S.I.S); which was his position.
3. #6 Special Investigation Agent (S.I.A) [NAME UNKNOWN] See: Notice to Court:
4. (1) Failed to investigate the conduct of the defendants who violated my
5. Civil Rights on, 1-23-2017, which is incumbent of the S.I.A who is an Agent
6. of the Office of Inspector General (O.I.G.) (2) Failed to report it to the
7. necessary agencies.
8. #7 CAPTAIN [NAME UNKNOWN] See: Notice to Court.
9. (1) He failed to train his staff properly; and to assure that his officers were
10. competent; and that they knew and followed policy, which resulted in my
11. Civil Rights being violated by, said defendants, on; 1-23-2017.
12. #8 Warden Joe Coxley:
13. (1) Failed to assure that he had competent staff and that they knew and
14. followed policy, which resulted in my Civil Rights being violated by the said
15. defendants, his staff, on 1/23/2017. (2) Failed to protect me from retaliation
16. by not placing me in the S.H.U of Hazelton, USP; which I informed him of
17. through the Administrative Remedy: BP-9; which resulted in my Civil Rights
18. being violated by, said defendants, on; 1/23/2017.
19. #9 Bureau of Prisons (B.O.P)
20. (1) Failed to ensure that Hazelton, USP; North Eastern Regional Office; and
21. Central Office responded properly to my Administrative Remedies: BP-9;
22. BP-10; and BP-11. UN which I informed them of threats of staff
23. retaliation and my need to be transferred from Hazelton, USP to protect me
24. from staff retaliation. Their incompetence resulted in my Civil Rights
25. being violated by, said defendants, on; 1/23/2017.
- 26.

1. #10 United States of America (USA)
2. (1) Failed to ensure the competency of its Agencies and the Agents
3. of those Agencies, NAMED AS defendants in the complaint, which
4. resulted in my Civil Rights being violated, by said defendants
5. on, 1/23/2017.

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## "Injuries"

### 2 Physical Injuries:

3. (1) I WAS violently beaten beyond recognition by inmate Gerald Hernandez  
 4. for approximately 30 minutes (2) One of my teeth was chipped as result  
 5. of Hernandez's assault. (3) My points was raised as a result of L.  
 6. McVickers falsifying an incident report against me. This stopped me  
 7. from getting transferred to a Medium Security prison which is less  
 8. violent and safer for a Transgender Female. (4) I've been housed in  
 9. a High Security prison, ever since; where I've been assaulted on numerous  
 10. occasions; I've been the victim of sexual assault and sexual harassment;  
 11. I've had my life threatened by a inmate with a knife; I've spent a total  
 12. of 10 months in the S.H.U; and I've attempted suicide twice. All which  
 13. would not, likely, have happened at a Medium Security Prison.

### 14. Psychological Injuries:

15. (1) I now suffer from severe anxiety and depression. (2) I now have  
 16. severe paranoia of being assigned to a cell with a male inmate, for fear  
 17. of being sexually assaulted or just plain assaulted. (3) I now suffer  
 18. from suicidal thoughts.

## "Relief"

21. I, Pray this Honorable Court to reward me Compensatory  
 22. Damages; Punitive Damages; and any, and all, damages that I  
 23. may be entitled to.

24.

25.


26.

Attachment A

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint and that the information contained in the complaint is true and accurate. Title 28 U.S.C. § 1746; 18 U.S.C. § 1621.

Executed at FCC Allenwood, USP on 3/14/2020.  
(Location) (Date)

  
\_\_\_\_\_  
Your Signature